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June 30, 2014

Mr. James Sales EPA Region 6 PCB Coordinator 1445 Ross Avenue Dallas, Texas 75202 214-665-6796

RE: Westlake Gas Plant Site, Nolan County, Texas – Supplemental Information to Remedial Action Plan

Mr. Sales;

Anadarko respectfully submits this letter as a supplemental document to the Remedial Action Plan for the remediation of Polychlorinated Biphenyls (PCBs) at the Former Westlake Natural Gasoline Plant which was submitted to you on May 22, 2014. This letter requests that remediation of the on-site soils and concrete impacted with PCBs be performed under 40 CFR 761.61(a) - Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste.

The PCB impacted materials are located approximately 4.5 miles north of the town of Maryneal in Nolan County, Texas. The property is an unoccupied area which is surrounded by ranch land. The portion of the property which contains soils with concentrations of PCBs > 1 ppm is entirely enclosed inside a five-strand barbed wire perimeter fence. That portion of the property which contains PCB impacted soils with concentrations greater than 25 ppm is enclosed within an additional three-strand wire fence (wholly inside the perimeter fence). The five-strand perimeter fence is accessible by two lockable gates, one on the northeast corner of the former plant site and one on the southwest corner of the former plant site.

Since the area to be cleaned up is not occupied, is fenced and has only limited access, the area is considered to be a low occupancy area as defined in 40 CFR 761.3.

As indicated in 40 CFR 761.61(a)(4)(i)(B), the cleanup level for bulk PCB remediation waste in low occupancy areas is  $\leq$  25 ppm, therefore, all on-site soil and concrete with PCB concentrations > 25 ppm will be removed and properly disposed. Materials with PCB concentrations  $\geq$  50 ppm will be disposed at the Waste Control Specialists (WCS) facility in Andrews County, Texas and materials with PCB concentrations > 25 ppm, but < 50 ppm may be disposed at the WCS facility or they may be disposed at the Republic Regional Landfill in Abilene, TX.

Following the removal of on-site materials with PCB concentrations greater than 25 ppm, verification soil samples will be collected from the bottom of each excavation. Samples will be collected using the

methods described in 40 CFR 761.286 to a maximum depth of 7.5 centimeters (approximately three inches), however, it is requested that dedicated plastic or vinyl hand trowels be used rather than the core samplers described in the method. The square grid verification method described in 40 CFR 761.283 (Subpart O) for non-point source areas will be used to verify that cleanup of soils with PCB concentrations > 25 ppm is complete. As described in 40 CFR 761.283(b)(2), the spacing between grid samples points is to be 1.5 meters (approximately 5 feet), however, due to the large acreage associated with this site, it is requested that the spacing between grid sample points be 7.5 feet rather than the prescribed 1.5 meters. Compositing of the grid point samples will be conducted using the nine-point compositing method described in 761.289(b)(1)(i); an onsite certified laboratory will composite each nine-point grid samples using the method described in in 761.289(a). The area of inference using the 7.5 feet spacing between grid sample points is approximately 506 square feet per composite sample as compared to approximately 218 square feet when using the prescribed 1.5 meter spacing. The 506 square feet inference area corresponds closely with the 500 square feet which was recommended in the Remedial Action Plan submitted to you on May 22, 2014. Composite verification samples will be analyzed for PCBs by a certified laboratory.

If there are any questions or comments, please call me at (832) 636-1000 or email at ross.haseberle@anadarko.com.

Very Truly Yours,

Ross Haeberle HSE Advisor

Anadarko Petroleum Corporation

Cc:

Linda Kuhn

Kurt Webber, AECOM



September 2, 2016

Mr. James Sales United States Environmental Protection Agency 1445 Ross Avenue Dallas, Texas 75202

RE: Former Westlake Gas Plant Site, Nolan County, Texas Update to Self-Implementing Remedial Action Plan

Dear Mr. Sales:

This letter is being submitted as an update to the June 30, 2014 "Supplemental Information to Remedial Action Plan" letter for the referenced site. Remediation of polychlorinated biphenyls (PCBs) was initiated at the site in December 2014 as a self-implementing on-site cleanup under 40 CFR 761.61(a).

The June 30, 2014 submittal stated that the self-implementing cleanup was being performed for on-site soils and concrete. Since initiation of remediation, Anadarko and the adjacent property owner, the 69 Ranch, have reached an agreement whereby the "off-site" area, owned by the 69 Ranch, will be remediated by Anadarko with the "on-site" area as one contiguous remediation area, following the plan established in the June 30, 2014 submittal. The contiguous remediation area (both on-site and off-site) is currently fenced and remediation is being conducted under Anadarko's control. Therefore, this letter clarifies that the self-implementing cleanup under 40 CFR 761.61(a) for a low occupancy area applies to the entire contiguous remediation area.

Additionally, this letter serves to update the written certification required by 40 CFR 761.61(a)(3)(E) regarding the location of sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the site. These items were formerly located at the site location in a temporary work trailer. These files are now located at the AECOM Dallas, Texas Office at 1950 N. Stemmons Freeway, Suite 6000, Dallas, Texas 75207. The signatures required by 40 CFR 761.61(a)(3)(E) for both Anadarko and AECOM certifying the location of the above-mentioned documents are provided below.

Once site activities have been completed, a formal report documenting the PCB remediation will be finalized and submitted to the USEPA.

If you have any questions or concerns please feel free to contact me at 832-636-3651 or Brian.Noonan@anadarko.com.

## Respectfully, ANADARKO PETROLEUM CORPORATION

Brian J. Noonan Remediation Advisor Anadarko Petroleum Corporation

For AECOM:

Marwan Salameh, PhD, P.E.

Sr. Program Manager

**AECOM**